

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
DIVISION

2014 MAY -2 PM 4:07

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

Dwight C. Holt Sr.
100 Valley View
Dickson Tn. 37055
Name of Plaintiff

v.

City of Dickson Police
202 South Main St
Dickson Tn. 37055
Name of Defendant(s)

Case No. _____
(To be assigned by Clerk)

Jury Demand ☐ Yes ☐ No

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964, and the Civil Rights Act of 1991, for employment discrimination. Jurisdiction is specifically conferred upon the Court by 42 U.S.C. § 2000e-5, or, if the Plaintiff is a federal employee, by 42 U.S.C. § 2000e-16. Relief is sought under 42 U.S.C. § 2000e-5(g) and/or 42 U.S.C. § 1981a(b).

2. Plaintiff, Dwight C. Holt Sr., is a citizen of the United States and resides at
100 Valley View B-15, Dickson,
Street address City
Dickson, Tenn, 37055, 215-569-4221.
County State Zip Code Telephone Number

3. Defendant, City of Dickson Police Dept, resides at, or its business is located at
202 South Main St, Dickson,
Street address City
Dickson, Tenn, 37055.
County State Zip Code

(If more than one Defendant, list the name and address of each additional Defendant)

Hydell Wesson City Manager

Johnny Channer Chief of Police

4. Plaintiff sought employment from the Defendant or was employed by the Defendant at

_____, City _____

Street address

_____, _____, _____

County

State

Zip Code

5. Defendant discriminated against Plaintiff in the manner indicated in paragraphs 8 and 9 of this Complaint on or about May 16 2013.

Month

Day

Year

6. Plaintiff filed charges against the Defendant with the Tennessee Human Rights Commission or the Equal Employment Opportunity Commission charging the Defendant with the acts of discrimination indicated in paragraphs 8 and 9 of this Complaint on or about January 29 2014.

Month

Day

Year

7. The Equal Employment Opportunity Commission or the United States Department of Justice issued a Notice of Right to Sue which was received by Plaintiff on February 6th 2014, a copy of which Notice is attached.

Month

Day

Year

8. Because of Plaintiff's (1) Black race, (2) _____ color, (3) _____ sex, (4) _____ religion, (5) _____ national origin, the Defendant:

- a. _____ failed to employ Plaintiff.
- b. X terminated Plaintiff's employment.
- c. _____ failed to promote Plaintiff.
- d. _____ retaliated against Plaintiff for having filed a charge of discrimination.
- e. _____ other. Explain: _____

9. The circumstances under which Defendant discriminated against Plaintiff were as follows:

*Was quite often telling other officers I wasn't doing
my job as far as answering calls. These officers
implying I was old, for police work.*

(You may use additional paper, if necessary.)

10. The acts set forth in paragraph 8 of this Complaint:

- a. _____ are still being committed by Defendant.
- b. X are no longer being committed by Defendant.
- c. _____ may still be being committed by Defendant.

11. Plaintiff attaches to this Complaint a copy of the charges filed with the Tennessee Human Rights Commission or the Equal Employment Opportunity Commission, which charges are submitted as a brief statement of the facts supporting this Complaint.

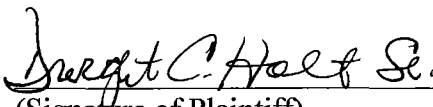
WHEREFORE, Plaintiff prays that the Court grant the following relief:

- a. _____ direct that Defendant employ Plaintiff, or
- b. _____ direct that Defendant re-employ Plaintiff, or
- c. _____ direct that Defendant promote Plaintiff, or
- d. _____ order other equitable or injunctive relief: _____

- e. _____ direct that Defendant pay Plaintiff back pay in the amount of _____ and interest on back pay;

- f. _____ direct that Defendant pay Plaintiff compensatory damages: Specify the amount and basis for compensatory damages: _____

- g. _____ direct that Defendant pay Plaintiff punitive damages in the amount of _____ because Defendant engaged in a discriminatory practice or practices with malice or with reckless indifference to Plaintiff's federally protected rights, as described in paragraphs 8 and 9 above; and that the Court grant such other relief as may be appropriate, including costs and attorney's fees.



 (Signature of Plaintiff)